

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

v. :

**NOTICE OF MOTION  
21 Cr. 263 (VM)**

**MANUEL ANTONIO SUQUILANDA,** :

Defendant. :

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**PLEASE TAKE NOTICE**, that based on the annexed affirmation of **Sylvie Levine, Esq.**, and documents incorporated therein, the defendant, **Manuel Antonio Suquilanda**, will move this Court, before the **Honorable Victor Marrero**, United States District Judge for the Southern District of New York, at a time to set by the Court, for an Order dismissing the indictment as it was obtained in violation of the Fifth and Sixth Amendments to the United States Constitution and in violation of the Jury Selection and Service Act.

Dated: New York, New York  
June 6, 2021

Respectfully submitted,

DAVID E. PATTON, ESQ.  
Federal Defenders of New York  
52 Duane Street, 10<sup>th</sup> floor  
New York, NY 10007  
By: Sylvie Levine  
Assistant Federal Defender

AUDREY STRAUSS  
Acting United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
By: Jane Chong  
Assistant United States Attorney